

Exhibit 1

From: Howard Goldberg <Howard.Goldberg@camdencounty.com>
Sent: Thursday, March 7, 2024 4:06 PM
To: Ronak Patel
Cc: Emeshe Arzon; John Schmidt; Joe Ripa; Matthew White
Subject: RE: Request for Parties' Consent to Proposed Amici's Motion for Leave to File Brief of Amici Curiae in Kim v. Hanlon

Mr. Patel:

If the other defendants consent, I will not be the lone hold-out.

Let me know.

Howard L. Goldberg
First Assistant County Counsel

Office of County Counsel
520 Market Street
Courthouse, 6th Floor
Camden, NJ 08102
Tel: 856-225-5543
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From: Ronak Patel <rpatel@aaldef.org>
Sent: Thursday, March 7, 2024 3:52 PM
To: Howard Goldberg <Howard.Goldberg@camdencounty.com>
Cc: Emeshe Arzon <Emeshe.Arzon@camdencounty.com>; John Schmidt <John.Schmidt@camdencounty.com>; Joe Ripa <Joe.Ripa@camdencounty.com>; Matthew White <Matthew.White@camdencounty.com>
Subject: Re: Request for Parties' Consent to Proposed Amici's Motion for Leave to File Brief of Amici Curiae in Kim v. Hanlon

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Mr. Goldberg –

Thank you for the prompt reply. To be clear, our request for consent does not ask any party to concede any substantive position, including as to the merits or timeliness of the plaintiffs' motion or as to the merits of amici's filing.

We are simply asking whether the parties are willing to consent to our amicus filing (and pro hac motions), in order to avoid unnecessary collateral motion practice regarding the motion for leave. To this end, we would be willing to include a note to the effect that "defendants' consent to the motion for leave is without prejudice to any of their substantive positions." Please let us know if that might resolve your concerns and help us avoid burdening the Court with a disputed motion for leave.

Thank you.

Ronak Patel

From: Howard Goldberg <Howard.Goldberg@camdencounty.com>

Sent: Thursday, March 7, 2024 1:42 PM

To: Ronak Patel <rpatel@aaldef.org>; Matthew White <Matthew.White@camdencounty.com>

Cc: Emeshe Arzon <Emeshe.Arzon@camdencounty.com>; John Schmidt <John.Schmidt@camdencounty.com>; Joe Ripa <Joe.Ripa@camdencounty.com>

Subject: RE: Request for Parties' Consent to Proposed Amici's Motion for Leave to File Brief of Amici Curiae in Kim v. Hanlon

Mr. Patel:

I'm afraid I cannot offer my consent. Our opposition to the plaintiffs' request for a preliminary injunction is focused not so much on the merits of the allegations but on the timeliness of the application. It is our position that such a substantial change to New Jersey's long-standing statutory election processes should not be addressed through rushed litigation under the pressure of an upcoming primary election. We believe that a change of such significance, should it be adopted, requires time for notification and education of voters, who for years have been accustomed to a certain ballot format. We believe the primary focus of the election laws in our state is on the voters, not the candidates. Thus, we believe that litigation over the constitutionality of our state's election laws should be directed to future elections, not one in which pre-election deadlines are scheduled to begin in a matter of weeks.

Thank you.

Howard L. Goldberg

First Assistant County Counsel

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From: Ronak Patel <rpatel@aaldef.org>

Sent: Thursday, March 7, 2024 12:18 PM

To: Howard Goldberg <Howard.Goldberg@camdencounty.com>; Matthew White
<Matthew.White@camdencounty.com>

Subject: Request for Parties' Consent to Proposed Amici's Motion for Leave to File Brief of Amici Curiae in Kim v. Hanlon

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Counsel –

I hope that this finds you well. My organization, the Asian American Legal Defense and Education Fund, along with AAPI New Jersey and Asian Americans Advancing Justice | AAJC, (the "proposed amici") intend to seek leave to file an amicus brief in this action. Specifically, the proposed brief will be submitted in support of plaintiffs' motion for a preliminary injunction (ECF No. 5) and will discuss the racially discriminatory effects of the county line on Asian American candidates and on Asian American voters. It will draw upon the proposed amici's focus and expertise in matters affecting the voting and democratic rights of Asian Americans.

In connection with this filing, we will also be seeking pro hac admission of myself, Jerry Vattamala, and Patrick Stegemoeller from the Asian American Legal Defense and Education Fund, and Noah Baron from Asian Americans Advancing Justice | AAJC.

We write to seek the parties' respective positions on our forthcoming motion for leave as well as our motion for pro hac admission of myself and Messrs. Vattamala, Stegemoeller, and Baron. We kindly ask that you please let us know by the close of business on Friday (3/8) if we may represent that the parties consent to our anticipated filings.

Thank you.

Ronak Patel

Ronak Patel

Equal Justice Works Fellow Sponsored by Cooley LLP

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